

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCTOBER 17, 1991

MEMORANDUM

SUBJECT: Extension Date for the Uniform Hazardous Waste Manifest

FROM: David Bussard, Director
Characterization and Assessment Division

TO: Hazardous Waste Management Division Directors
Regions I - X

Attached is a copy of a letter we recently received from OMB regarding extension of the manifest. As the letter indicates, our Information Collection Request was not approved. Since, technically, use of the manifest is approved until September 1992 (from the last round of approval requests), we will be publishing a technical correction in the Federal Register changing the September 30, 1991, expiration date to a September 30, 1992, expiration date.

Therefore, the following guidance can be provided:

- Use of the Uniform Hazardous Waste Manifest is approved through September 30, 1992, under OMB approval number 2050-0039 (same number as before).
- Use of existing stocks of September 30, 1991, forms may continue until stocks are depleted, or until September 30, 1992. The 1991 date may be crossed out and replaced with the 1992 date.
- If forms have already been printed with the September 30, 1994, date in anticipation of the expected 1994 approval date, they may be used until September 30, 1992. The 1994 date may be crossed out and replaced with the 1992 date.
- If additional manifest forms are needed, a one-year supply of forms with the September 30, 1992, date should be printed.

Feel free to contact me or Angela Cracchiolo of my staff at FTS-260-4779 if you have further questions.

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET

WASHINGTON, D. C. 20503

SEP 30 1991

Mr. Don Clay
Assistant Administrator for Solid Waste and Emergency Response
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Clay:

On July 16, 1991, the Environmental Protection Agency (EPA) submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act an information collection request (ICR) entitled "Requirements for Generators, Transporters, and Disposers Under the RCRA Hazardous Waste Manifest System," commonly referred to as the Uniform Hazardous Waste Manifest. EPA requires that a hazardous waste manifest accompany each shipment of hazardous waste to off-site treatment and disposal facilities to ensure that each shipment reaches its intended destination.

During the public comment period, we received written comments from the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) and the National Solid Waste Management Association (NSWMA). These comments described several problems with the manifest. ASTSWMO also raised some of these issues directly with EPA in an earlier petition, but EPA was apparently unwilling to address them. In a letter dated February 22, 1991, EPA informed ASTSWMO that because of a lack of resources, EPA would not address their petition in the immediate future.

OMB believes that several of the issues raised in the public comments merit further consideration. These issues include: 1) Uniform changes to the manifest to allow for optical scanning or other technological advances; 2) Alteration of the manifest to conform with current Department of Transportation requirements for the shipment of hazardous wastes; and, 3) Adoption of uniform national standards for the distribution of copies of the manifest. Because a review of these issues will take some time, the use of this form will be approved through September 30, 1992, under OMB approval number 2050-0039. EPA should submit a renewal package for review several months before the September 30, 1992, expiration date. This renewal ICR should explain how EPA plans to address the public comments. If EPA cannot address these issues in a timely fashion, EPA should contact OMB promptly and demonstrate that it is making reasonable progress in addressing these issues.

EPA and several States have reported that the hazardous waste manifest forms currently used by the different States carry different expiration dates, including September 1991, September 1992, and September 1994. Therefore, until September 1992, the public may comply with the manifest requirement by using a form with any expiration date that has already been printed. This will allow States which have already printed forms with a September 1994 expiration date to use those forms until September 30, 1992. It will also allow States which have not printed new forms, but have stocks of forms with an expiration date of September, 1991, to continue using their stocks until they are depleted or until September, 1992, (whichever comes first). If, after reviewing the ICR renewal package to be submitted next year, OMB extends approval of the current form past September, 1992, without any changes, OMB will then consider allowing the public to continue using forms with a September, 1994, expiration date.

If you have any questions regarding this action, or if EPA would like to discuss the issues identified in public comments before submitting the renewal package to OMB for review, please contact either me or my staff.

Sincerely,

Arthur G. Fraas, Chief
Natural Resources Branch
Office of Information and
Regulatory Affairs